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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

GALLAGHER-KAISER CORPORATION, a
Michigan corporation,

Plaintiff,

vs.

LIBERTY DUCT, LLC, a Nevada limited
liability company; BIO SHIELD TECH, LLC,
a foreign limited liability company;
HARTFORD CASUALTY INSURANCE
COMPANY, an Indiana insurance corporation;
NGM INSURANCE COMPANY, a Florida
corporation; and DOES 1-10 Insurance
Company(ies), inclusive,

Defendants.

Case No. 2:14-cv-00869-GMN-DJA

**STIPULATION AND REQUEST
FOR ORDER EXTENDING
DEADLINE FOR DEFENDANT
NGM INSURANCE COMPANY TO
FILE MOTION TO DISMISS
PLAINTIFF'S FOURTH AMENDED
COMPLAINT**

(First Request)

Defendant NGM Insurance Company ("NGM"), by and through its attorneys of record, and Plaintiff Gallagher-Kaiser Corporation ("GKC"), by and through its attorneys of record, hereby stipulate and agree as follows:

WHEREAS, the Court granted NGM's Motion to Dismiss GKC's Third Amended Complaint without prejudice with leave to amend, ordering that GKC file its Fourth Amended Complaint by December 20, 2023, and a Motion to Dismiss be filed by January 10, 2024 (Doc.182);

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